

MICHAEL J. STEINER (State Bar No. 112079)  
JOSHUA E. WHITEHAIR (State Bar No. 244900)  
SEVERSON & WERSON  
A Professional Corporation  
One Embarcadero Center, Suite 2600  
San Francisco, CA 94111  
Telephone: (415) 398-3344  
Facsimile: (415) 956-0439  
[mjs@severson.com](mailto:mjs@severson.com)  
[jew@severson.com](mailto:jew@severson.com)

Attorneys for Defendant  
WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GUSTAVO REYES and MARIA TERESA  
GUERRERO, husband and wife, individually  
and on behalf of others similarly situated,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A., a national  
bank; and DOES 1-100, inclusive,

Defendants.

Case No.: 3:10-cv-01667-JCS

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
AS TO DISCOVERY AND FILING  
DEADLINE FOR CLASS  
CERTIFICATION MOTION**

WHEREAS, the Court has previously approved stipulations extending the deadline for Plaintiffs to file and serve their motion for class certification to afford Plaintiffs sufficient time to conduct class discovery following receipt of Defendant's supplemental responses to Plaintiffs' first set of written discovery;

WHEREAS, Defendant's supplemental responses were delayed while the Court considered and decided Defendant's motion to dismiss the First Amended Complaint and so as to permit Defendant sufficient time to conduct a reasonably diligent search for responsive information and documents;

WHEREAS, pursuant to the last stipulation and order, Defendant served supplemental responses on February 4, 2011, providing verified answers to several interrogatories and agreeing to produce certain policies and procedures in response to requests for production. Nevertheless, the remaining interrogatories require complex data queries which Defendant was not able to complete by

February 4. Defendant continues to work diligently to complete these queries and is attempting to determine the extent to which it can provide reliable responses in a non-burdensome manner;

WHEREAS, counsel for Plaintiffs and Defendant are meeting and conferring on these issues and have tentatively set an in person meeting for February 17, 2011 pursuant to the Court's Standing Orders;

WHEREAS, the parties agree that in the interest of judicial efficiency good cause exists for one last extension of the deadlines for Defendant to serve further supplemental responses and Plaintiffs to file their motion for class certification.

WHEREFORE, the parties agree and hereby stipulate, and respectfully request, that the deadline for Plaintiffs to file their motion for class certification be extended from June 14, 2011 to July 14, 2011 and that Defendant shall serve further supplemental responses by March 7, 2010. 2011 - JCS.

This stipulation is without prejudice to the rights, claims, defenses and arguments of all parties.

DATED: February 11, 2011

LAW OFFICES OF PETER B. FREDMAN  
LAW OFFICES OF DAVID PIVOTRAK

By: /S/ Peter B. Fredman  
Peter B. Fredman

Attorneys for Plaintiffs

DATED: February 11, 2011

SEVERSON & WERSON  
A Professional Corporation

By: /S/ Joshua E. Whitehair  
Joshua E. Whitehair

Attorneys for Defendant

PURSUANT TO THE STIPULATION,

**IT IS SO ORDERED.**

Date: February 14, 2011

